

### **REMARKS**

In the Final Office Action dated February 18, 2005, the Examiner rejected then pending claims 1, 6, 9, 10, 13, 14, 15 and 18 under 35 USC 102(b) as allegedly being anticipated by WO 99/19814 ("Pouflis"), and rejected claims 2-5, 7, 8, 11, 12 and 16-17 under 35 USC §103(a) as allegedly being obvious in view of Pouflis and US 6,298,341 ("Mann et al.") – and in further view of Examiner's Official Notice in the case of claims 7, 8, 11, 12 and 16-17. Applicants have amended claims 1 and 13 to more particularly point out the present inventions, and canceled claims 4 and 14. Thus, claims 1-3, 5-13 and 15-19 are currently pending in the application (a cleaned version of all currently pending claims are attached hereto for the convenience of the Examiner). Applicants respectfully traverse the Examiner's rejections below.

While the Examiner alleges (see Office Action, Page 2, Para. 3, "using or registering") that Pouflis in the abstract and claims 1, 8 and 9 discloses the registration of domain names, none of the portions of Pouflis the Examiner cites have any disclosure whatsoever of registration of domain names. This is understandable as Pouflis is not concerned with the registration of domain names, but rather is merely concerned with how multilingual labels are encoded as to be transmitted and understood between and by computers within a network, including the Internet.

Presumably, the multilingual label is stored in a database somewhere (perhaps in the pseudo-root domain name server) (See Pouflis, page 7, lines 5-34). However, nowhere in Pouflis is disclosed the registration of the alpha numeric string converted from a non-English native word as the domain name with an authorized registrar that ensures a unique one to one correspondence with the registered domain name and its corresponding IP address. Indeed, the pseudo-root domain name server appears to teach away from the claimed invention of the Applicants as the distributed maintenance of the multilingual labels will not ensure a globally unique correspondence between a string and an IP address.

In contrast, claims of the present invention clearly require that a native language domain name be converted into an alphanumeric domain name and registering the converted domain name with an authorized domain name registrar to ensure a globally unique correspondence between the native domain name and its corresponding IP address.

For example, claim 1 of the present application recites, *inter alia*:

“...registering said converted alphanumeric domain name with an **authorized** alphanumeric domain name registrar... wherein said step of registering comprises **adding an entry in a domain name server database**, said added entry defining unique correspondence relationship between said converted alphanumeric domain name and an Internet Protocol (IP) address of a web site of said registrant. [Emphasis added]

The present claim 9 recites, *inter alia*:

“...performing a domain name server inquiry **using said converted alphanumeric domain name to obtain an Internet Protocol (IP) address** of said destination website...”[Emphasis Added]

Claim 13 recites, *inter alia*:

“...register said converted alphanumeric domain name with an authorized alphanumeric domain name registrar... that maintain a database of domain names... **said database of domain names having a plurality of entries defining unique correspondence relationships between a plurality of alphanumeric domain name and respective ones of a plurality of Internet Protocol (IP) addresses.**” [Emphasis Added]

In contrast, Pouflis, while disclosing conversion multilingual labels into ASCII string for the purpose of transmitting to other computers, is wholly devoid of any disclosure of **registration** of converted ASCII string itself as the domain name so that the domain name and its corresponding IP address is kept within a database to ensure that only one such correspondence exists, and thus also devoid of any disclosure of obtaining a unique IP

address using the converted ASCII string itself as the registered domain name.

With respect to the Examiner's rejection of claims 2-5, 7, 8, 11, 12 and 16-17 in view of Pouflis and Mann et al., it is respectfully submitted that Mann et al. does not cure the deficiencies of Pouflis, and is also devoid of any teaching of converting a native language domain name into alphanumeric domain name and registering the converted name as the domain name as recited by the independent claims 1, 9 and 13 as explained above. Accordingly, the combination of Pouflis and Mann et al. cannot be used to establish a *prima facie* case of obviousness.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 382, 1385, 165 USPQ 494, 496 (CCPA 1970). If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). [MPEP § 2143.03]

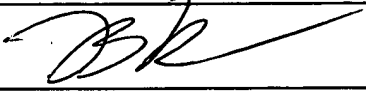
Thus, at least for the same reason, claims 1, 9 and 13 are allowable, so are all claims that depend therefrom.

Accordingly, for at least the foregoing reasons, it is respectfully submitted that the prior art references of record, either standing alone or in combination, do not anticipate nor render obvious the present invention. The Applicants therefore respectfully request that the Examiner withdraw the rejections, and allow the present application to issue.

### **CONCLUSION**

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections, and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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